

## **Region 3 GPRA Baseline RCRA Corrective Action Facility**

# **KKI, Inc.** (Formerly: Keller Ladders, Inc.; Keller Aluminum)

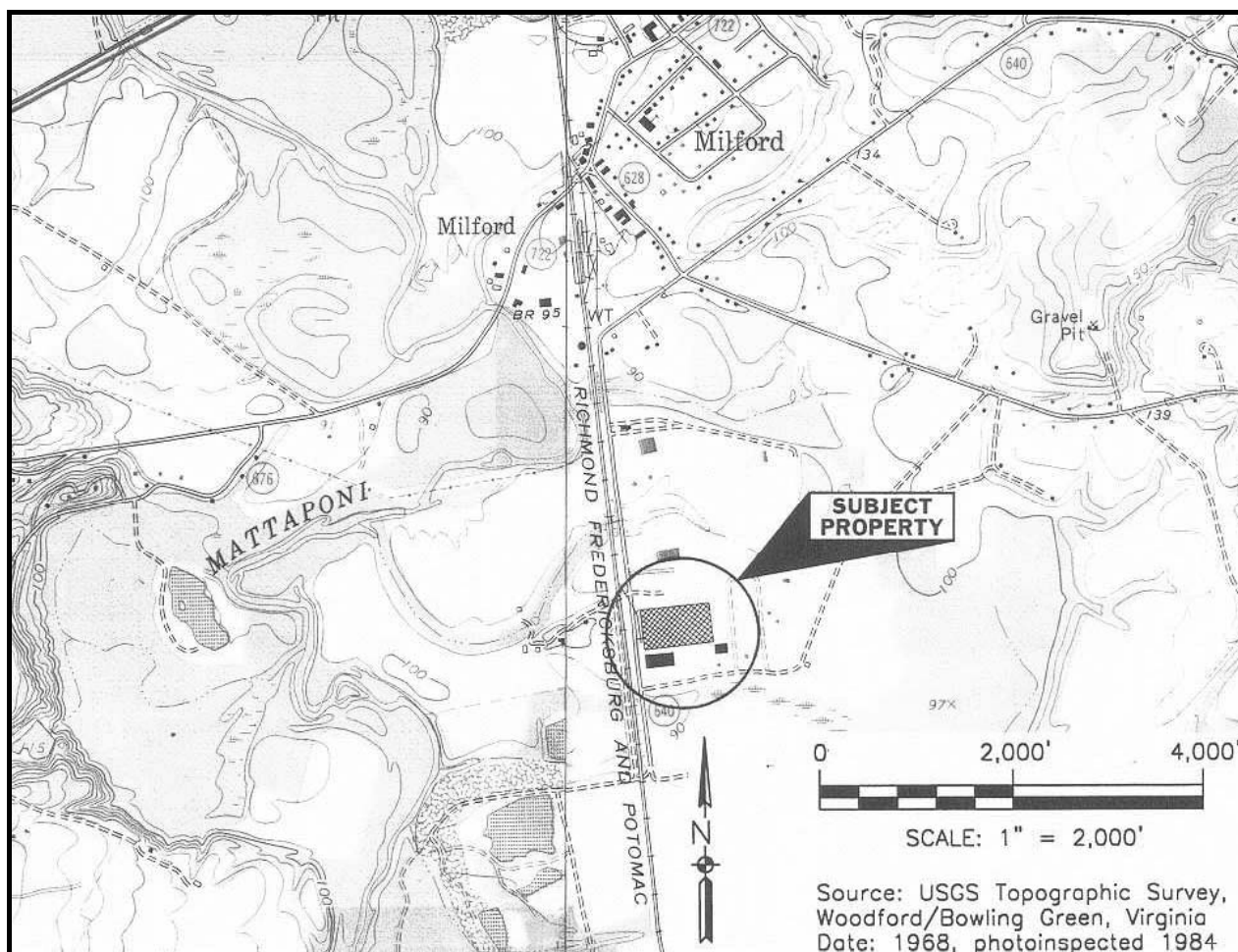
16174 Industrial Drive

Milford, VA 22514

Congressional District 1

EPA ID #: VAD052356623

Last Updated: January 1, 2004



## **Current RCRA CA Activities**

The Virginia Department of Environmental Quality's (DEQ) is the lead agency for oversight of RCRA Corrective Action work at the facility. The DEQ and the facility are in the process of establishing the mechanism (i.e., a permit) for conducting RCRA Corrective Action activities.

The facility submitted on October 23, 2001, a RFI Data Presentation Report. The DEQ will review the RFI Data Presentation Report and provide comments to the facility.

A post-closure care permit was issued on September 19, 1997 for a hazardous waste surface impoundment with wastes closed in place. The permit is currently the subject of an appeal by the facility. Groundwater is being monitored quarterly and the results submitted to the DEQ pursuant to the post-closure care permit. Most recently, the DEQ has completed its review of the 2002 Annual Groundwater Monitoring Report.

## Site Description

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The facility, located south of the town of Milford in Caroline County, Virginia, consists of a 21.33 acre parcel bounded by Industrial Drive (Route 640) to the west, Route 773 to the south, Hoover Wood Products to the east and Jones Chemical to the south.

During approximately 1968 to 1988, the following three businesses were operated at the facility: Keller Extrusions of Virginia, Inc., Keller Building Products of Virginia, Inc., and Keller Ladders of Virginia. Management of wastewater prior to the construction of a surface impoundment in 1977 is unclear. The property contains a drainage ditch located next to the surface impoundment and parallel to Route 773. The drainage ditch contains two drains that are constructed below Route 773 and discharge into neighboring wetlands.

The property contains a closed surface impoundment that is subject to a RCRA post-closure care permit issued September 19, 1997 by the DEQ.

## RCRA CA Milestones

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EPA Region III completed a RCRA Facility Assessment (RFA) in January 1989. On October 23, 2001, KLI, Inc. submitted an independent investigation report on the entire site to EPA Region III. The report recommends the following actions:

- Remove and dispose of sludge from an outdoor sump (SWMU #8)
- Remove and dispose of wastewater and sludge from two concrete holding tanks (SWMU #11)
- Complete a site wide risk assessment to determine whether site-wide closure can be obtained.

On December 4, 2001, EPA and DEQ met with Keller representatives to assess the work done by Keller's consultant, discuss information needed to complete the environmental indicators, and discuss process options to obtain the information.

As of March 7, 2003, the lead authority for RCRA Corrective Action at the facility was transferred from EPA Region III to DEQ. Representatives of DEQ and KLI, Inc. met on May 20, 2003, to discuss the change in lead agency and necessary actions for continued progress of RCRA Corrective Action work at the facility.

## Environmental Indicator Status

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Under the Government Performance and Results Act (GPRA), EPA has set national goals to address high priority RCRA Corrective Action facilities by the year 2005. EPA is evaluating two key indicators for each facility: Current Human Exposures Under Control and Migration of

Contaminated Groundwater Under Control. This facility is one of EPA Region III's high priority facilities and falls under this initiative. As of September 26, 2003 the current evaluation of Environmental Indicators for this facility is as follows:

- *Human Exposures Controlled Determination:* Based upon available information, the Human Exposures are Controlled. Please refer to form CA725 dated September 26, 2003 for more details.
- *Release to Groundwater Controlled Determination:* Based upon available information, Groundwater Releases are Controlled. Please refer to form CA750 dated September 25, 2003 for more details.

## Contaminants

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Contaminants found in the groundwater and soil include chromium and low levels of chlorinated organics.

## Community Involvement

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Citizens' questions and concerns may be directed to the contact below. Also, the Administrative Record containing relevant information is available for public review at the following location(s):

Virginia Department of Environmental Quality  
629 East Main Street  
Richmond, Virginia 23219  
PHONE: (804) 698-4131  
CONTACT: Garwin W. Eng

## Government Contacts

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The Commonwealth of Virginia has the lead authority for this project. Please contact the state project manager listed below for details on this project or the contents of this fact sheet.

DEQ Project Manager  
Garwin W. Eng  
Virginia Department of Environmental Quality  
P.O. Box 10009  
Richmond, VA 23240-0009  
Phone: (804) 698-4131  
Email: [gweng@deq.state.va.us](mailto:gweng@deq.state.va.us)

EPA Project Manager  
Diane Schott - 3WC23  
U.S. Environmental Protection Agency - Region III  
1650 Arch Street

Philadelphia, PA 19103-2029  
Phone: (215) 814-3430  
Email: [schott.diane@epa.gov](mailto:schott.diane@epa.gov)

For more information about EPA's corrective action program, including Environmental Indicators, please visit EPA's web site at: [www.epa.gov/reg3wcmd/correctiveaction.htm](http://www.epa.gov/reg3wcmd/correctiveaction.htm)

## Facility Contact

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### The Facility Contact is:

Tom L. Green  
President, CEO  
KLI, Inc.  
c/o USI Properties, Inc.  
950 E. Paces Ferry Road, Suite 2110  
Atlanta, Georgia 30326-1125  
Phone: (404) 364-6321

## Factsheet Updates

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The previous factsheet was updated July 1, 2003. The next update is scheduled for July 1, 2004. Previous factsheets may be obtained through the listed contacts.